

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

3:14-CR-270

MO

Case No.

Plaintiff,

INFORMATION

v.

HAROLD RAY BETTENCOURT II,
KATHY SUE BETTENCOURT,
HAROLD RAY BETTENCOURT III,
NICHOLAS RYAN BETTENCOURT,
PETER TRACY BETTENCOURT,
MARGO ANTONETTE DENSMORE,
JOSHUA LEE KEMP, AND
KUSTOM PRODUCTS, INC.,

Defendants.

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1:
Conspiracy to Commit Offenses against the United States

Beginning at an undetermined time and continuing through December 1, 2010, in the District of Oregon and elsewhere, defendants Harold Ray Bettencourt II, Kathy Sue Bettencourt, Harold Ray Bettencourt III, Nicholas Ryan Bettencourt, Peter Tracy Bettencourt, Margo Antonette Densmore, Joshua Lee Kemp and Kustom Products, Inc. did knowingly conspire, confederate and agree with each other to commit criminal offenses against the United States, and to defraud the United States in one or more of the following ways:

1. By devising a material scheme and artifice to defraud the United States Department of Defense (DoD) and to obtain money and property from the DoD by means of materially false and fraudulent pretenses, representations and promises and to transmit by means of

wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds for the purpose of executing the material scheme and artifice to defraud and to obtain money and property as defined at Title 18 United States Code, Section 1343;

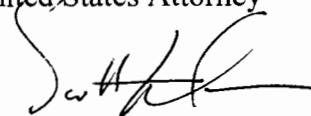
2. By engaging in monetary transactions in criminally derived property of a value greater than \$10,000.00 which was derived from specified unlawful activity, to wit, wire fraud, knowing that the money involved in the financial transaction represented the proceeds of wire fraud as defined at Title 18, United States Code, Sections 1956(h) and 1957(a), (b)(1), and (d)(1); and
3. By intentionally trafficking in goods or services, and knowingly using a counterfeit mark on or in connection with such goods or services as defined at Title 18 United States Code, Section 2320(a)(1).

All in violation of Title 18, United States Code, Section 371.

DATED this 30th day of June, 2014.

Respectfully Submitted,

S. AMANDA MARSHALL
United States Attorney


SCOTT ERIK ASPHAUG
Assistant United States Attorney